

## Postal Regulatory Commission

Washington, D.C. 20268-0001

### NOTICE OF FILING UNDER 39 U.S.C. § 404(d)

TO THE UNITED STATES POSTAL SERVICE:

Please take notice that on August 11, 2011, the Commission received a petition for review of the Postal Service's determination to close the Grant post office located in Grant, Iowa. The petition for review was filed by Laurenda Mifflin (Petitioner) and is postmarked August 5, 2011.

This notice is advisory only and is being furnished so that the Postal Service may begin assembling the administrative record in advance of any formal appeal proceedings held upon the alleged (closing/consolidation) for transmittal pursuant to 39 CFR § 3001.113(a) (requiring the filing of the record within 15 days of the filing with the Commission of a petition for review). The Postal Service's administrative record is due no later than August 26, 2011.



Ruth Ann Abrams  
Acting Secretary

Date: August 12, 2011

Attachment

Received

8-4-2011

To Whom it may concern:

AUG 10 2011

A2011-44 RECEIVED

This is my attempt at an Appeal. I don't understand the paperwork so hope I do o.k. Please let me know if I need to do anything further or supply anything else. 2011 AUG 11 1:57

Our Post Office is supposed to close 60 days from August 1 2011. There are a lot of questions that were never answered, not answered fully or were skirted around, or the answer made no sense to the question in concern.

This is going to take you awhile so grab something to drink and a comfortable chair. Enclosed are copies of a letter among the many I have sent the USPS and their responses (if they can be called that).

Having our post office closed is NOT just an "inconvenience". It's downright dangerous for some of us. We have no bank here to get "cash" for the mailman and no public transport of any kind. The USPS say we can go to Elliott or Villisca for postal service but Elliott is on the potential closure list. Villisca is 17 miles away. Gas is very expensive. I am on a limited, and low, income. They say to go there when you go grocery shopping and such but I shop in Atlantic which is the opposite direction. The USPS says one of the reasons for closure is we don't have a postmaster. They never tried to replace the postmaster at this office. They never answered the question as to what it would take to keep the Post office open so we customers could do something to save it. We were never given the chance. They refuse to tell me what options there are besides cluster boxes. They say they can't deliver to your home because the mailman would have to carry 2 trays. One for Villisca and one for Grant. Guess What?? He already does that. He carries both because the people on the outskirts of Grant have a Villisca address. They keep saying they don't get money from the government but the Federal Trade Commission says that they get 39-117 million dollars per year. They say a cluster box is beneficial to senior citizens over a post office or home delivery. 'ARE THEY NUTS?' They say that customers won't have to pay fees for the post office boxes with the cluster boxes. We don't pay any fees now. It does not save time and energy for customers to have a cluster box. Just the opposite. The Post Office is a long distance call, waiting for m. o.'s, medications can freeze, arthritic fingers trying to use a key (we have combination locks for the present time and it's heated in there). There is no set time for the postman to arrive at the boxes. You could be waiting several minutes to several hours in subzero temperatures. They say it will not adversely effect the community. HOGWASH!! They say there are no

special needs that need to be addressed or accommodated. I specifically asked the person in charge of the Post Office here is if home deliveries could be made for those of us with problems and she said she was not allowed to make any special accommodations. Rural Post Offices are a total of .07% of the USPS operating budget. How is closing rural offices going to do anything to make a dent in their financial crisis? Who the hell is giving them advice on how to save money? They can't even decide how much they will be saving when they close our office. On page 3 of the determination to close they quote \$22, 547 a year and on page 8 it is \$18, 957 per year. They say they can't send me a handwritten response because it costs too much, but they use all this ink in the determination to close asking and answering the same questions several times when once is sufficient. We are told to do more with less, so why can't the Post Office? If the USPS can't handle the workload of customers then this government monopoly should be dissolved and privatized post offices should be allowed. Don't you think it's time you stopped making the American people suffer? You've had years upon years to resolve this problem and instead you procrastinate till it's too late. The USPS is a lost cause. Approve privatization of Postal services. You're just kicking a dead horse. I'm only one person but one voice is supposed to count in this country. The American people are having so much taken from them: the right to protect property, the right to keep property (imminent domain), and so on. Everything is now money and greed. I don't believe we should suffer because of the short-sightedness of the USPS. We need our Post Office or at the very least home delivery. We also would like answers we never received. I don't know the proper forms to use and know eloquent words but I am human and hope that this One Voice will be heard. I've enclosed a copy of the Final Determination as I referenced it so much and so you can see it is repetitive, doesn't make sense in some areas, avoids answers in others and proves they can't do numbers very well. I'm signing off before I get repetitive.

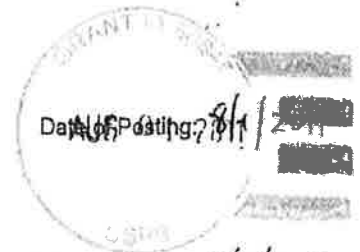
Thank you, sadly, Laurenda Mifflin

P. O. Box 175-507 4<sup>th</sup> st.

Grant, Iowa 50847

A handwritten signature in cursive script that reads "Laurenda Mifflin". The signature is written in dark ink and is positioned below the typed name and address.

DOCKET NO. 1365387 - 50847  
ITEM NO. 47  
PAGE 1



Date of Removal: 9/2/2011

FINAL DETERMINATION TO CLOSE  
THE GRANT, IA POST OFFICE  
AND ESTABLISH  
SERVICE BY RURAL ROUTE SERVICE

DOCKET NUMBER 1365387 - 50847

## I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service is issuing the final determination to close the Grant, IA Post Office and provide delivery and retail services by rural route service under the administrative responsibility of the Villisca Post Office, located 17 miles away. Service will be provided to cluster box units (CBUs).

CBUs are secure free-standing units of individually locked mail compartments installed and maintained by the Postal Service at no cost to the customer. A parcel locker may also be installed.

The postmaster position became vacant when the postmaster retired on July 10, 2010. Since the postmaster vacancy an OIC has been installed to operate the office. Postmaster level and office service hours are determined by a workload analysis which includes the number of deliveries and revenue.

The office was studied for possible closing or consolidation due to the following reasons: Study for discontinuance request based on minimal workload, revenue, need for more operational efficiency, and the ability of the Postal Service to provide effective and regular service by an alternate means.

The Grant Post Office, an EAS-53 level, provides service from 08:30 - 13:00 Monday - Friday, 09:00 - 11:00 Saturday and lobby hours of 7:00-19:00 on Monday - Friday and 7:00-19:00 on Saturday to 44 post office box or general delivery customers and no delivery customers. Retail services included the sale of stamps, stamped paper, and money orders; special services such as Registered Mail, Certified Mail, Insured Mail, COD Mail, and Express Mail services; and the acceptance and dispatch of all classes of mail.

The retail window averaged 12 transaction(s) accounting for 12 minute(s) of retail workload daily. With minimal workload, the Postal Service feels that effective and regular service will be provided by rural route service. Office receipts for the last 3 years were: \$11,740 (31 revenue units) in FY 2008; \$11,757 (31 revenue units) in FY 2009; and \$9,034 (24 revenue units) in FY 2010. There were no permit mailer(s) or postage meter customer(s).

On February 23, 2011, representatives from the Postal Service were available at to answer questions and provide information to customers. 47 customer(s) attended the meeting.

On February 14, 2011, 45 questionnaires were distributed to delivery customers of the Grant Post Office. Questionnaires were also available over the counter for retail customers at the Grant Post Office. 27 questionnaires were returned. Responses regarding the proposed alternate service were as follows: 3 favorable, 13 unfavorable, and 11 expressed no opinion.

One congressional inquiry was received on February 22, 2011.

A petition supporting the retention of the Grant Post Office was received on February 23, 2011, with 73 signatures.

When this final determination is implemented, delivery and retail services will be provided by the Villisca Post Office, an EAS-16 level office. Window service hours at the Villisca Post Office are from 08:30 16:00, Monday through Friday, and none on Saturday. There are 100 post office boxes available.

The proposal to close the Grant Post Office was posted with an invitation for comment at the Grant Post Office, Elliott Post Office and Villisca Post Office from March 22, 2011 to May 23, 2011. The following additional concerns were received during the proposal posting period:

1. **Concern:**

Customer wanted a handwritten response.

**Response:**

The customer stated on the comment form that you wanted to handwritten response. We apologize but cannot fulfill your request to have a handwritten response. The Postal Service is continually looking for means to be efficient and cost effective. Handwriting responses would take more time and therefore would incur an unnecessary cost for the Postal Service.

2. **Concern:**

Customers questioned as to why install CBUs and not allow people to install a box in front of their home.

**Response:**

The customer questioned as to why you couldn't have a box in front of your home. The goal of the Postal Service is to allow the community to maintain Grant, IA 50847 in their address. In order to do that, deliveries with the same zip code, need to be commingled all together. Carriers deliver directly from a tray that comes ready for delivery and having two different zip codes would require the carrier to work out of two trays. This would be a very inefficient means of delivery and would encourage misdeliveries. As a solution, the Postal Service is proposing CBUs. Customers may be able to obtain curbside delivery but it may mean that they would need to change their address to Villisca, IA 50864. It may also mean that it wouldn't be in front of their house for the more the carrier travels, the more it costs the Postal Service.

3. **Concern:**

Customers questioned as to why install CBUs and not allow people to install a box in front of their home.

**Response:**

The customer questioned as to why you couldn't have a box in front of your home. The goal of the Postal Service is to allow the community to maintain Grant, IA 50847 in their address. In order to do that, deliveries with the same zip code, need to be commingled all together. Carriers deliver directly from a tray that comes ready for delivery and having two different zip codes would require the carrier to work out of two trays. This would be a very inefficient means of delivery and would encourage misdeliveries. As a solution, the Postal Service is proposing CBUs. Customers may be able to obtain curbside delivery but it may mean that they would need to change their address to Villisca, IA 50864. It may also mean that the mailbox wouldn't be in front of their house for the more the carrier travels, the more it costs the Postal Service. The Postal Service is seeking more cost effective means of service while still maintain effective and regular service.

4. **Concern:**

Customers questioned that the Postal Service was pursuing discontinuance of the Grant Post office because it is running at a deficit.

**Response:**

The customer stated on the comment form that it was stated in the proposal that the reason for the study was because the office is running at a deficit. The proposal states that the reason for the study was due to "minimal workload, volumes, revenue, need for more operational efficiency, and the ability of the Postal Service to provide effective and regular service by an alternate means". Whether or not this office is running at a deficit is not one of the reasons that we are looking at possible discontinuance. The Postal Service projects to save \$22547 as year. Further comparisons as you have requested are not part of the study and may be requested through the Freedom of Information Act. Instructions on requesting that information can be found at [www.usps.com](http://www.usps.com).

5. **Concern:**

Customers were concerned about customers standing around waiting for the carrier to perform postal transactions.

**Response:**

The customer were concerned about customers standing around waiting for the carrier to perform postal transactions. Customers may leave packages or stamp orders in their mailbox for the carrier. However, for packages that will not fit, we ask the customer to call the administrative office to see what their options are.

6. **Concern:**

Customers were concerned about obtaining accountable mail and large parcels.

**Response:**

The customer stated that several people work out of town and cannot sign for accountables. If the customer lives less than one-half mile from the line of travel, the carrier will attempt delivery of accountable items and large parcels to the customer's residence. If the customer lives over one-half mile away or is not home when delivery is attempted, a notice will be left in the mailbox. Large parcels will be left outside the mailbox or at a location designated by the customer (if authorized by the customer), or a notice will be left in the mailbox. Attempted delivery items will be taken back to the Villisca Post Office. Customers may pick up the item at the post office, request redelivery on another day or authorize delivery to another party.

7. **Concern:**

Customers were concerned about obtaining services from the carrier.

**Response:**

The customer stated that going to the Elliott or Villisca Post Offices are not convenient and the carrier cannot take care of all postal transactions. The carrier can perform nearly all postal transactions right from their vehicle. For those transactions that cannot be performed by the carrier, the customer is encouraged to stop at a Post Office in conjunction with other trips such as grocery shopping.

8. **Concern:**

Customers were concerned about the handicapped information presented on the Post Office Survey Sheet.

**Response:**

The customer questioned as to why the Post Office Survey Sheet stated that there were no customers with disabilities. When performing the study, we are looking for customers that have special needs that need special accomodation. At the time of the study, the officer in charge was asked if they were aware of any customers with special needs that we perform special accomodation for. The answer was no. As a result, we answered no to the statement in question. We will change the form and answer yes but will also state that no special accomodations have been made at this time.

9. **Concern:**

The customers wanted to know what the Postal Service was doing to cut costs.

**Response:**

The customer asked on the comment form what other measures the Postal Service is taking to reduce expenses. The Postal Service is consolidating plants, looking at small post office and station discontinuance, working with unions to help lower employee salary expenses, and raising rates for large mailers, freezing wages, and reducing benefits for all employees to name a few of the many means of cost reduction. The Postal Service is also asking congress to reconsider the mandated 6 day delivery requirement and to allow deferred payments to the retirement prefunded accounts.

The following nonpostal concerns were expressed from questionnaires, the community meeting, on the petition, and on the congressional inquiry:

1. **Concern:**

Customer expressed a concern about package delivery and pickup.

**Response:**

The customer expressed a concern about package delivery and pickup. Rural carriers will deliver packages that fit in your rural mail box, if the package does not fit in the mail box, the carrier will deliver the package up to 1/2 mile off of the line of travel, at a designated place, such as on your porch or under a carport. If the package needs to be signed for, the carrier will leave a notice in your box. Customers may then pick up the item at the Post Office, request redelivery on another day, or authorize delivery to another party.

2. **Concern:**

Customers said they would miss the special attention and assistance provided by the personnel at the Grant Post Office.

**Response:**

The customer have express concern regarding the special assistance you received in regards to stamp selection. Courteous and helpful service will be provided by personnel at the Villisca Post Office and from the carrier. Special assistance will be provided as needed.

3. **Concern:**

Customers were concerned about obtaining services from the carrier

**Response:**

The customer were concerned about obtaining services from the carrier, retail services provided at the post office are available from the carrier. Most transactions do not require meeting the carrier at the mailbox. Stamps by Mail and Money Order Application forms are available for customer convenience. Listed below are some services available from the carrier and how to obtain them. PURCHASING STAMPS BY MAIL: The Stamps by Mail Program provides customers the opportunity to purchase stamps, envelopes, and postal cards by using Form 3227-R, Stamp Purchase Order (Rural), available from the post office or the carrier. Commemorative stamps and stamp collecting products are also available. The customer addresses the postage paid order form envelope, encloses payment by personal check or postal money order made payable to the US Postal Service, and mails the form (postage-free) or leaves it in the mailbox for the carrier to pick up. Most orders are processed overnight, and some immediately. PURCHASING POSTAL MONEY ORDERS: Customers may purchase money orders by meeting the carrier at the mailbox, completing an application, and paying the carrier (in cash) the price of the money order, plus the fee. The carrier gives the customer a receipt for the application. The money order is completed when the carrier returns to the post office, and a money order receipt is left in the customer's mailbox on the next delivery day. Most customers provide the carrier with a stamped, self-addressed envelope in which the completed money order is mailed to its destination. If customers prefer, the completed money orders will be

returned for verification on the next delivery day. ~~SPECIAL SERVICES~~- Special services such as certified, registered, Express Mail, delivery confirmation, signature confirmation, and COD may be obtained from the carrier by leaving a note in the mailbox, along with the appropriate payment. The carrier will provide the services that day and leave a customer receipt in the mailbox on the next delivery day. **HOLDING MAIL:** Customers who will be away for an extended time, such as a vacation, may request that their mail be held at the post office during their absence. Upon return the customer asks the post office to resume deliv

4. **Concern:**

Customers were concerned about obtaining services from the carrier

**Response:**

The customer were concerned about traveling to nearby Post Office to perform postal transactions. Retail services provided at the post office are available from the carrier. Most transactions do not require meeting the carrier at the mailbox. Carriers will accept packages at the mailbox without the customer being present, provided the postage is fully prepaid, and the customer is known to reside or conduct business at the collection point. The package MUST have a matching return address that is the same as the collection point. Estimate the amount of postage needed and leave the money in the mailbox. If insurance is desired, the value of the contents must be specified. The carrier will take the package to the Post Office, and it will be weighed to determine the appropriate rate. The package will be mailed that same day. The carrier will leave the customer's change and insurance receipt, if appropriate, in the mailbox on the next delivery day.

5. **Concern:**

Customers were concerned about senior citizens and people with disabilities obtaining Postal Services.

**Response:**

The customer expressed a concern about senior citizens. Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to Cluster Box Units. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.

6. **Concern:**

Customers were concerned about senior citizens and people with special challenges.

**Response:**

The customer expressed a concern about senior citizens and people with special challenges. Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to cluster box units. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.

7. **Concern:**

Customers were concerned about senior citizens.

**Response:**

The customer expressed a concern about obtaining mail in poor weather conditions. Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to Cluster Box Units. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.

8. **Concern:**

Customers were concerned about the loss of a gathering place and an information center.

**Response:**

The customer have stated that the people in the community use the post office for their social outing. Residents may continue to meet informally, socialize, and share information at the other businesses, churches, and residences in town.

9. **Concern:**

Customers were concerned about the loss of a gathering place and an information center.



- Response:** The customer have stated that you use the Grant Post Office to read town business reports and other reports. Residents may continue to meet informally, socialize, and share information at the other businesses, churches, and residences in town.
10. **Concern:** Customers were concerned about the loss of a gathering place and information center.
- Response:** The customer have stated that you visit friends at the Post Office when you pick up your mail. Residents may continue to meet informally, socialize, and share information at the other businesses, churches, and residences in town.
11. **Concern:** Customer expressed a concern about package delivery and pickup
- Response:** Rural carriers will deliver packages that fit in your cluster box unit or in the parcel locker. If the package does not fit, the carrier will deliver the package up to ½ mile off of the line of travel, at a designated place, such as on your porch or under a carport.
12. **Concern:** Customers asked why door delivery service was not available to them.
- Response:** The growth of suburban areas and the shift of population to one geographic area to another have created new challenges for the Postal Service. To meet these challenges, delivery regulations were changed in 1978 to eliminate door delivery as an option for new residential areas. Current delivery options are roadside or centralized delivery provided by motorized carrier.
13. **Concern:** Customers asked why their post office was being discontinued while others were retained
- Response:** Post offices are reviewed on a case-by-case basis. When there is a vacancy in a small office, it is customary to conduct a study of the business activity and investigate the feasibility of providing service by alternate means.
14. **Concern:** Customers Inquired about cluster box unit installation and maintenance.
- Response:** Cluster Box units are purchased, installed, and maintained by the Postal Service at no expense to customers.
15. **Concern:** Customers inquired as to what degree of volume was needed to have Grant not be considered for discontinuance.
- Response:** Volume is not the only factor that is taken into consideration when making a proposal to discontinue an office. Other factors such as revenue and the ability of the Postal Service to provide effective and regular delivery are also taken into consideration. As a result, there is no set amount that would curtail the study for discontinuance in any office.
16. **Concern:** Customers questioned the economic savings of the proposed discontinuance
- Response:** Carrier service is more cost-effective than maintaining a postal facility and postmaster position. The Postal Service estimates a positive annual savings.
17. **Concern:** Customers were concerned about senior citizens
- Response:** Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to CBUs. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.
18. **Concern:** Customers were concerned that boxes would be installed along highway

**Response:**

We will be proposing to install cluster box units at one or multiple locations throughout the community. The location will be a place that is safe for both the carrier and the customers. If a location along highway 71 will serve the people efficiently, effectively, and is safe, to may be considered.

**Some advantages of the proposal are:**

1. The rural and contract carriers may provide retail services, alleviating the need to go to the post office. Stamps by Mail order forms are provided for customer convenience.
2. Customers opting for carrier service will have 24-hour access to their mail.
3. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
4. CBUs can offer the security of individually locked mail compartments. Parcel lockers provide convenient parcel delivery for customers.
5. Customers opting for carrier service will not have to pay post office box fees.
6. Saves time and energy for customers who drive to the post office to pick up mail.

**Some disadvantages of the proposal are:**

1. The loss of a retail outlet and a postmaster position in the community. Retail services may be provided by the rural or contract delivery carrier.
2. Meeting the rural or contract delivery carrier at the box to transact business. However, it is not necessary to be present to conduct most Postal Service transactions.
3. A change in the mailing address. The community name will continue to be used in the new address. A carrier route address will be assigned.

Taking all available information into consideration, the Postal Service concludes this final determination will provide a maximum degree of effective and regular postal services to the community.

**II. EFFECT ON COMMUNITY**

Grant is an incorporated community located in Montgomery County. The community is administered politically by Mayor and Council. Police protection is provided by the Montgomery County Sheriff. Fire protection is provided by the Grant Fire Department. The community is comprised of Retirees, Self employed, Commuters and those who commute to work at nearby communities and may work in local businesses.

Businesses and organizations include: Grant Fire Department, Grant Methodist Church, City of Grant, Legion Auxillary, Legion Post LGN0445, The Hayloft, Swartz Implement, Chase Rebuilders, Grant Communications, Amos Fabulous Foods, Devo Properties, Rainey Rentals, JC Home Improvement, JC Repairs, JC Greenhouse, Fountain Perk LLC. Residents may travel to nearby communities for other supplies and services.

Nonpostal services provided at the Grant Post Office will be available at the Villisca Post Office. Government forms normally provided by the Post Office will also be available at the Villisca Post Office or by contacting your local government agency.

The following nonpostal concerns were expressed from questionnaires, the community meeting, on the petition, and on the congressional inquiry:

- 1. Concern:** Customers expressed concern for loss of community identity

**Response:** The customer expressed a concern about the loss of the community's identity. A community's identity derives from the interest and vitality of its residents and their use of its name. The Postal Service is helping to preserve community identity by continuing the use of the suspended Post Office name and ZIP Code in addresses and in the National Five-Digit ZIP Code and Post Office Directory.
- 2. Concern:** Customers were concerned about the loss of a gathering place and an information center.

**Response:** The customer stated in the questionnaire that you used the Post Office to meet with neighbors. Residents may continue to meet informally, socialize, and share information at the other businesses, churches, and residences in town.
- 3. Concern:** Customers were concerned about the loss of employment.

**Response:**

The customer have stated that the Postal Service is placing people out of work by closing the Grant Post Office. The Officer in Charge is a career employee that will not be separated from the Postal Service. She will return to her home office and continue employment. The postmaster replacement is not a career employee, however, she may be reassigned to another office if there is an available position that she is qualified for.

**4. Concern:**

Customers were concern about the loss of a gathering place and an information center.

**Response:**

The customer stated on the comment form that there were only 3 businesses where people can get together. If people cannot gather at the existing businesses, they can gather at residences in town.

Based on the information obtained in the course of this discontinuance study, the Postal Service concludes this final determination will not adversely affect the community.

**III. EFFECT ON EMPLOYEES**

The postmaster position became vacant when the postmaster retired on July 10, 2010. The noncareer postmaster relief (PMR) may be separated from the Postal Service. No other Postal Service employee will be adversely affected. Since the postmaster vacancy an OIC has been installed to operate the office.

**IV. ECONOMIC SAVINGS**

The Postal Service estimates an annual savings of \$ 18,957 with a breakdown as follows:

Postmaster Salary (EAS-53, No COLA)	\$ 15,350
Fringe Benefits @ 33.5%	\$ 5,142
Annual Lease Costs	<u>+ \$ 3,400</u>
Total Annual Costs	\$ 23,892
Less Annual Cost of Replacement Service	<u>- \$ 4,935</u>
Total Annual Savings	<u>\$ 18,957</u>

A one-time expense of \$ 2077 will be incurred for the movement of this facility.

**V. OTHER FACTORS**

The Postal Service has identified no other factors for consideration.

## VI. SUMMARY

This is the final determination to close the Grant, IA Post Office and provide delivery and retail services by rural route service under the administrative responsibility of the Villisca Post Office, located 17 miles away. Service will be provided to cluster box units (CBUs).

The postmaster retired on July 10, 2010. If the office has a noncareer PMR(s), they may be separated from the Postal Service; however, attempts will be made to reassign the employee(s) to a nearby facility. No other employee(s) will be adversely affected. The workload has declined. Effective and regular service will continue to be provided by rural route service.

The Grant Post Office provided delivery and retail service to 44 PO Box or general delivery customers and no delivery route customers. The daily retail window transactions averaged 12. There are no permit mailers or postage meter customers.

There will no longer be a retail outlet in the community. However, delivery and retail services may be available from a rural or contract delivery carrier, which could alleviate the need to travel to a Post Office for service. The Postal Service will save an estimated \$18,957 annually. A disadvantage to some will be in meeting the rural or contract delivery carrier to transact business. However, it is not necessary to be present to conduct most Postal Service transactions with rural or contract delivery carrier.

Taking all available information into consideration, the Postal Service has determined that the advantages outweigh the disadvantages and this final determination is warranted.

## VII. NOTICES

- A. Support Materials. Copies of all materials upon which this final determination is based are available for public inspection at the Grant Post Office, Elliott Post Office and Villisca Post Office during normal office hours.
- B. Appeal Rights. This final determination to close the Grant Post Office may be appealed by any person served by that office to the Postal Regulatory Commission at 901 New York Ave NW, Suite 200, Washington DC 20268-0001. Appeals must be received by the Commission within 30 days of the date this final determination is posted. If an appeal is filed, copies of appeal documents prepared by the Postal Regulatory Commission or the parties to the appeal will be made available for public inspection at Grant Post Office, Elliott Post Office and Villisca Post Office during normal office hours.



Dean J Granholm  
Vice President of Delivery and Post Office Operations

07/27/2011

Date

Date 5 4 2011

## Response to this letter item 7

To whom it may concern:

I am writing once again. Our questions have not been answered to our satisfaction. I expect a handwritten personalized response instead of a generic letter that doesn't make sense to the average person. (item 1) You seem to be soon willing to put our physical bodies in harm's way by 'insisting' on cluster boxes, I don't believe it's unreasonable for me to expect you to take the slim chance of a finger cramp to actually 'write' a letter.

Are you paying attention yet? I'm trying to write with carpal tunnel and a cat sitting on my paper. You can write, even if it's been awhile since you've picked up a writing instrument.

You say that we can do business with the mail carrier at the boxes but no one knows (including the carrier) what time he/she will arrive.

'NO ONE' can stand in subzero temperatures to wait several minutes to several hours. They will literally turn into a human popsicle. Our hands will be so cold we won't be able to hold the key. Mailing packages would be next to impossible especially for those of us with canes, walkers, wheelchairs... Part of your Survey has a question (#12) about handicapped & infirmed. The answer says 'none' (item 2). That is a lie. There are a lot of us with physical impairments such as a quadraplegic in a wheelchair, me with a cane and so on. Section 101(b) of Title 39 of the U.S. Code (item 3) says the Postal Service shall provide a "MAXIMUM" degree of effective and regular service to rural areas and small towns where

post offices are not self sustaining and no small post office shall be closed solely for operating at a deficit. This is the reason we are being given for this proposal - our post office runs at a deficit. I want to know the cost difference of the postman delivering to the Post office, the cluster boxes, and home delivery. I want to know why you won't even consider home delivery when it would

1. Save you a lot of money over having a post office
2. Ensure the safety of your customers
3. It is what the customers want second to having a Post office.

Why are you not considering other options?

If you are I want to know what they are.

Where's your compassion and empathy for your fellow humans? Is the almighty \$ sign blinding you and making you deaf to the pleas and concerns of your customers and to the suffering they will endure? You're a monopoly. It's not like we can get stamps and such from another agency. What other things are you doing or considering to cut costs? Why didn't you notify your customers years ago about your financial problems so that we could opt to use the postal service more frequently so this wouldn't happen?

What is the REAL reason for the closings?

I wrote to you before that we customers if given the option might be willing to pay for the extra 1 minute it takes the postman for home deliveries and we received a generic

letter with no response to this.

Are you still paying attention?

I am enclosing a map of our town (item 4) with #'s. The #'s correspond to the next page of this letter. This is to show the preponderance of elderly. When you had a public meeting here in Grant the Corning Postmaster said that even with a DR's note only 1 or 2 people would be approved for home delivery ("Shame" on you.)

Enclosed is also a Poem I wrote (item 5). Show it to whomever you please. Pass it around. It's our sentiment.

Enclosed is a drawing of what seems to be going on (item 6) Hang it up for everyone to see. Nothing in this letter is Private. Show it to the world if you care to. Am I going to receive a response that makes sense? Are you going to answer those questions? Are you listening to us? What do we have to do to either keep the post office open or have home delivery? Tell us. We will try to make it happen.

Hopefully awaiting your personalized response.

Copies: USPS  
Obama  
Senator

Sincerely

Laurenda Mifflin  
P O Box 175  
Grant IA 50847  
712 763 4582

*Laurenda Mifflin*





# Names deleted for privacy

5

name age  
This is not totally complete but close.

no minors listed

1.	47	33.	50's
2.	50's	34.	40's
3.	90's	35.	60's
4.	80's	36.	40's
5.	80's	37.	50's
6.	30's	38.	70's
7.	30's	39.	50's
8.	50's	40.	50's
9.	50's	41.	70's
10.	60's	42.	50's
11.	30's	43.	50's
12.	60's	44.	30's
13.	70's	45.	50's
14.	40's	46.	50's
15.	40's	47.	30's
16.	70's	48.	30's
17.	60's	49.	80's
18.	80's	50.	80's
19.	40's	51.	50's
20.	60's	52.	50's
21.	30's	53.	60's
22.	30's	54.	60's
23.	60's	55.	60's
24.	60's	56.	70's
25.	80's	57.	50's
26.	50's	58.	50's
27.	20's	59.	50's
28.	young	60.	30's
29.	young	61.	50's
30.	50's	62.	80's
31.	50's	63.	60's
32.	40's	64.	70's

Continued

<u>Name</u>	<u>age</u>
65.	50's
66.	20's
67.	30's
68.	young
69.	70's
70.	30's
71.	50's

I don't know everyone's name thus a ? mark.  
and there may be some new people I haven't met.  
For the most part this is complete.

As you can see there are at least 26 people  
over the age of 60 out of 71 people

and 48 people over the age of 50.

That is more than  $\frac{1}{3}$  of the community as  
senior citizens and over  $\frac{1}{2}$  are almost there.



item ①

03/09/2011

LAURENDA MIFFLIN

PO BOX 175  
GRANT, IA 50847

Dear Postal Service Customer:

Thank you for returning your questionnaire concerning the proposed discontinuance of the GRANT Post Office. Your comments, along with others received, will be included in the official record and considered carefully before further action is taken.

In response to your letter:

- You expressed a concern about senior citizens and people with special challenges. Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to cluster box units. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.

If it is determined that a discontinuance of the GRANT Post Office should be pursued, a formal proposal will be posted in the GRANT Post Office(s) at a later date. If you have additional questions or comments, please feel free to contact Karen Lenane at (319) 399-2902.

Sincerely,

A handwritten signature in cursive script that reads "Jean Susnjar for Jean Susnjar".

Jean Susnjar  
Manager, Post Office Operations  
PO Box 9998  
Cedar Rapids, Iowa, 52406-9998

item (2)

Docket: 1365387 - 50847

Page Nbr: 15

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**Post Office Survey Sheet**(continued)

10.	What equipment in the Post Office is not owned by the Postal Service (e.g., Post Office Boxes, furniture, safe)?	
	none	
11.	List potential CBU/parcel lockers sites and distances from present Post Office site.	
	Along main street. Within 1-3 blocks from the present Post Office site.	
12.	Are there any special customer needs? (People who cannot read or write, who cannot drive, who have infirmities or physical handicaps, etc.) How can these people be accommodated?	
	none	
13.	Rural delivery/HCR delivery.	
a.	What is current evaluation?	H38
b.	Will this change result in the route being overburned?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	If so, what accommodations will be made to adjust the route?	NA
c.	How many boxes and miles will be added to the route?	44, box 0 Miles
d.	What would be the additional annual expense if the route is increased?	1345
e.	What is the one-time cost of CBU/parcel locker installation (if appropriate)?	2077
f.	At what time of the day does the carrier begin delivery to the community?	9:30
	Will this delivery time be affected if the office is discontinued? (Y or N)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	If so, how?	0
14.	Are the Post Office box fees at the facility that will provide alternative service different from those at the office to be discontinued? If so, how (Cost)? <input type="checkbox"/> More <input checked="" type="checkbox"/> Same <input type="checkbox"/> Less	
	However, those who currently are eligible for a no fee rental on their box will need to pay box rental at another Postal facility in order to continue Box service if the office is discontinued	

## THE APPEALS PROCESS MAY SAVE A POST OFFICE, BUT ONLY IF USED

By the Hon. Wayne Schley  
Former Postal Rate Commissioner

Section 101(b) of Title 39 of the U.S. Code reads as follows:

"The Postal Service shall provide a maximum degree of effective and regular postal service to rural areas, and small towns where post offices are not self-sustaining. *No small post office shall be closed solely for operating at a deficit* (emphasis mine), it being the specific intent of the Congress that effective postal services be insured to residents of both urban and rural communities."

Too often this section of the law governing the U.S. Postal Service has been overlooked or not carried out in the spirit that Congress intended. Consequently, in 1976 Congress added a new responsibility to the Postal Regulatory Commission (PRC). That new task was the responsibility of serving as an appellate court, so to speak, for those interested citizens who wished to object to any action to close or consolidate their local post office.

The idea was to allow the local citizens to ensure the law was being carried out as Congress intended. Since the PRC accepted this new responsibility, there have been 292 appeals by citizens to stop the taking away of their post offices. Of these, 54 have been remanded, or rejected, and sent back to the Postal Service.

It should be noted, however, that 22 of these rejected cases occurred in the first year when the Postal Service was learning how to go about the process of closing a post office. The agency has learned its lesson well; in the past 19 years, it has lost only 32 cases.

Of the almost 300 cases appealed before the PRC, 66 have been dismissed or withdrawn by the Postal Service. These cases, by and large, were ones so deficient that the Postal Service itself withdrew its efforts to close or consolidate the post offices.

One startling fact should be noted: Less than 8 percent of all post office closings or consolidations are appealed. It is hard to believe that 100 percent of the people in 92 percent of the communities faced with the loss of their post offices do not object. I suspect the real reason for so few appeals is that folks simply do not know that you can fight City Hall, or in this case, the Postal Service. Remember, it is not really so much "fighting City Hall" as it is simply being heard by a disinterested party in order to prevent a federal agency trampling on

the rights of postal customers.

The Postal Regulatory Commission is, indeed, a disinterested third party. It has been said that, if anything, the PRC bends over backwards not to interfere with the Postal Service's management prerogatives in these cases. In fact, the law does not allow the Commission to second-guess postal management's decision to close or consolidate a post office. The Postal Regulatory Commission may only examine the agency's decision and record, and decide whether the Postal Service has stayed within the guidelines the law has established.

The law requires the Postal Regulatory Commission to approve the Postal Service's decision unless the agency was:

- arbitrary, capricious, indiscreet, or otherwise not in accordance with the law;
- without observance of procedures required by law, or
- unsupported by substantial evidence on the record.

In actuality, the Postal Regulatory Commission may not change the Postal Service's final decision to close or consolidate an office. It can only affirm, or let stand, the agency's decision, or return (remand) for further consideration (i.e., do it right next time).

Despite all the above, the appeals process is very important in bringing to light the actions of Postal Service management and ensuring they follow not only the letter of the law, but the spirit of the law, as well. Once an issue sees the light of day, minds often can be changed. Elected officials and the public can become involved. Efforts to save a post office can be galvanized.

However, unless the appeals process is used, none of these actions can occur. The key is to use the appeals process the way Congress intended. When 92 percent of the post offices are closed without the appeals process being used, the law is not working the way Congress envisioned.

The challenge—especially to retired Postmasters—is to either use, or urge others to use, the appeals process where warranted. If it is not used, there is no chance to save a post office. The result is a loss not only to the community and the Postal Service—which, after all, loses a retail outlet—but to the nation as a whole.

item 5

# Cluster F\*\*\*ed

Cluster box with key and lock

Enemy of mine

Where's my home delivery

Won't you be kind.

Compassion wanes

As money campaigns

For your health

Your welfare

Your life

I'm rickety and old

And the blast of cold

On my skin

Keeps me from my medicine

Let me live

Won't you give

The mail to a

Box at home

What happened to the Postal Creed

It's been trampled on with Postal greed

Cluster box

With key and lock

written by  
Laurenda  
Mifflin  
2011  
Grant Iowa

Enemy of mine .

Where's my home delivery

Can't you be kind.





Hern (7)



05/26/2011

LAURENDA MIFFLIN

PO BOX 175  
GRANT, IA 50847

Dear Postal Service Customer:

Thank you for taking the time to submit your comments on the proposal to consolidate the GRANT. Your comments are appreciated and will be carefully considered, along with the comments of other customers, as the matter is reviewed further in my office and at higher levels of the Postal Service.

In response to your letter:

- You stated on the comment form that you wanted to handwritten response. We apologize but cannot fulfill your request to have a handwritten response. The Postal Service is continually looking for means to be efficient and cost effective. Handwriting responses would take more time and therefore would incur an unnecessary cost for the Postal Service.
- You questioned as to why the Post Office Survey Sheet stated that there were no customers with disabilities. When performing the study, we are looking for customers that have special needs that need special accomodation. At the time of the study, the officer in charge was asked if they were aware of any customers with special needs that we perform special accomodation for. The answer was no. As a result, we answered no to the statement in question. We will change the form and answer yes but will also state that no special accomodations have been made at this time.
- You were concerned about customers standing around waiting for the carrier to perform postal transactions. Customers may leave packages or stamp orders in their mailbox for the carrier. However, for packages that will not fit, we ask the customer to call the administrative office to see what their options are.
- You stated on the comment form that it was stated in the proposal that the reason for the study was because the office is running at a deficit. The proposal states that the reason for the study was due to "minimal workload, volumes, revenue, need for more operational efficiency, and the ability of the Postal Service to provide effective and regular service by an alternate means". Whether or not this office is running at a deficit is not one of the reasons that we are looking at possible discontinuance. The Postal Service projects to save \$22547 as year. Further comparisons as you have requested are not part of the study and may be requested through the Freedom of Information Act. Instructions on requesting that information can be found at [www.usps.com](http://www.usps.com).
- You asked on the comment form what other measures the Postal Service is taking to reduce expenses. The Postal Service is consolidating plants, looking at small post office and station discontinuance, working with unions to help lower employee salary expenses, and raising rates for large mailers, freezing wages, and reducing benefits for all employees to name a few of the many means of cost reduction. The Postal Service is also asking congress to reconsider the mandated 6 day delivery requirement and to allow deferred payments to the retirement prefunded accounts.
- You questioned as to why you couldn't have a box in front of your home. The goal of the Postal Service is to allow the community to maintain Grant, IA 50847 in their address. In order to do that, deliveries with the same zip code, need to be commingled all together. Carriers deliver directly from a tray that comes ready for delivery and having two different zip codes would require the carrier to work out of two trays. This would be a very inefficient means of delivery and would encourage misdeliveries. As a solution, the Postal Service is proposing CBU's. Customers may be able to obtain curbside delivery but it may mean that they would need to change their address to Villisca, IA 50864. It may also mean that the mailbox wouldn't be in front of their house for the more the carrier travels, the more it costs the Postal Service. The Postal Service is seeking more cost effective means of service while still maintain effective and regular service.

I realize that with change there is always concern. However, we are confident that rural route service will continue to provide you with effective and regular service. If you have questions or further comments concerning this change in service, please feel free to contact Karen Lenane at (319) 399-2902.

Sincerely,

A handwritten signature in black ink, reading "Jean Susnjak". The signature is written in a cursive style with a large, stylized initial "J".

Manager, Post Office Operations  
PO Box 9998  
Cedar Rapids, Iowa, 52406-9998